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10 Attorneys for Plaintiff  
11 Harkant Dhruv and the Class

12  
13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15

16  
17 **HARKANT DHRUV**, on behalf of himself  
and all others similarly situated,

18 Plaintiff,

19 vs.

20 **AXA EQUITABLE LIFE INSURANCE**  
21 **CO.; et al.,**

22 Defendants.  
23

**No. C07-04368-WHA**

**CLASS ACTION**

**ADMINISTRATIVE  
MOTION TO CONSIDER  
WHETHER CASES  
SHOULD BE RELATED  
PURSUANT TO L.R. 3-12.**

**PAUL MEOLA**, individually, and on behalf  
of all others similarly situated,

Plaintiff,

vs.

**AXA FINANCIAL, INC.; AXA  
ADVISORS, LLC; AXA EQUITABLE  
LIFE INSURANCE CO.**; and DOES 1  
through 10, inclusive,

Defendants.

**No. C06-04291 JSW**

**CARLTON M. LENNON**, individually, and  
on behalf of all other members of the general  
public similarly situated, **JAMES L.  
THOMPSON**, individually, and on behalf of  
all other members of the general public  
similarly situated,

Plaintiffs

vs.

**AXA ADVISORS, LLC; AXA  
NETWORK, LLC**; and DOES 1 through 20,  
inclusive,

Defendants.

**No. 07-01858 JSW**

**ANTHONY BOLEA**, on behalf of himself  
and all others similarly situated,

Plaintiff,

vs.

**AXA ADVISORS, LLC and AXA  
EQUITABLE LIFE INSURANCE CO.**,

Defendants.

**No. C07-02777 JSW**

1 Plaintiff Harkant Dhruv hereby moves for the Court's consideration whether  
 2 *Dhruv v. AXA Equitable Life Insurance Company, et al.* (C07-04368), filed on  
 3 August 23, 2007, is related to the following earlier filed cases: (1) *Meola v. AXA*  
 4 *Financial, Inc., et al.* (C06-04291-JSW), filed July 13, 2006; (2) *Lennon v. AXA*  
 5 *Advisors, LLC, et al.* (C07-01858-JSW), filed April 3, 2007; and (3) *Bolea v. AXA*  
 6 *Advisors, LLC, et al.* (C07-02777-JSW), filed May 29, 2007.

7 Pursuant to Local Rule 3-12(a), these actions are related. They involve  
 8 substantially the same parties and events. The plaintiffs in all four cases allege the  
 9 same causes of action arising out of these events against the same defendants.  
 10 Like the plaintiffs in the above referenced cases, Plaintiff herein alleges that, as a  
 11 Financial Services Professional for AXA, he is entitled to overtime pay pursuant  
 12 to the provisions of the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.*, and  
 13 under California wage and hour statutes. Based on these commonalities, it is  
 14 likely there would be an unduly burdensome duplication of labor and expense or  
 15 conflicting results if the cases were conducted before different judges in this  
 16 district. Therefore, assignment of all four of these cases to a single judge would  
 17 conserve judicial resources and promote an efficient determination of the actions.

18 In an August 31, 2007 hearing before Judge Jeffery White in *Meola*, counsel  
 19 for all parties to the above referenced actions stated no objection to relating these  
 20 four cases.

21 Dated: September 5, 2007

**COTCHETT, PITRE & McCARTHY**  
**JOHN M. KELSON LAW OFFICE**

22 By:                     /s/                      
 23                     NANCY L. FINEMAN                    

24 *Attorneys for Plaintiff Harkant Dhruv*  
 25 *and the Class*